



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND REGION
5 POST OFFICE SQUARE SUITE 100 OES 05-1 BOSTON, MA 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 08 2015

Mr. Alfredo Goncalves
President
A.T. Wall Company
55 Service Avenue
Warwick, Rhode Island 02886

Re: Notice of Noncompliance Regarding the Chemical Accident Prevention Requirements of the Clean Air Act for A. T. Wall Company in Warwick, RI.

Dear Mr. Goncalves:

On August 6, 2013, representatives of the United States Environmental Protection Agency (EPA) conducted an inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance of A. T. Wall Company with the Chemical Accident Prevention Provisions of Section 112(r)(7) of the federal Clean Air Act (CAA).

The Chemical Accident Prevention Provisions of Section 112(r)(7) of the Clean Air Act, 42 U.S.C. § 7412 (r)(7), and 40 CFR Part 68, require facilities which produce, handle, process, distribute, or store certain chemicals to develop a Risk Management Program, prepare a Risk Management Plan, and submit the plan to EPA. The plan must be revised and resubmitted to EPA at least every five years, or as otherwise required by 40 CFR § 68.190(b)(2) through (7).

Based upon EPA's inspection of your facility on August 6, 2013, and a review of other information, EPA has determined that A. T. Wall Company failed to meet all the requirements applicable to its Program 3 anhydrous ammonia system (the "covered process") as detailed below:

- properly document the Risk Management Program management system in accordance with regulatory requirements (40 C.F.R. § 68.15(b) and (c));
- label and/or tag all outdoor piping and valves for the covered process consistent with industry standards (40 C.F.R. § 68.65(d));
- add appropriate informative signs in the ammonia tank area in accordance with NFPA 704 consistent with industry standards (40 C.F.R. § 68.65(d));
- raise the ammonia pressure relief header vent so that the exhaust point is at least 15 feet above the roof line of the building consistent with industry standards (40 C.F.R. § 68.65(d));

- replace or inspect, clean, and test ammonia pressure relief valve #26 consistent with industry standards (40 C.F.R. § 68.65(d));
- update the facility's process hazard analysis (PHA) to include the dissociators (40 C.F.R. § 68.67(c));
- address all outstanding recommendations from the July 2011 PHA and properly document the resolution of these items (40 C.F.R. § 68.67(e));
- prepare a written operating procedure to document the daily walk through of the covered process—an accompanying checklist should include the dissociators and document all attributes included in the inspection (40 C.F.R. § 68.69(a));
- review and certify that operating procedures for the covered process are current and accurate (40 C.F.R. § 68.69(c));
- prepare all required training documentation to verify that employees understood the covered process training (40 C.F.R. § 68.71(c));
- expand the current contractor program to include all appropriate contractors—the inspection identified at least five contractors who have been overlooked (40 C.F.R. § 68.87); and
- revise the emergency response plan for the covered process to be consistent with the facility's One-Plan (40 C.F.R. § 68.95).

Notice is hereby given that A. T. Wall Company failed to meet all the requirements of Section 112(r) of the CAA. Within 30 days of receipt of this Notice, please submit a description of actions taken to address the violations listed above. The information should be sent to:

Jim Gaffey, Chemical Engineer
 U.S. Environmental Protection Agency
 Office of Environmental Stewardship
 RCRA, EPCRA and Federal Programs Unit
 Mail Code OES 05-1
 5 Post Office Square, Suite 100
 Boston, MA 02109-3912

Failure to correct the violations as required by this Notice may subject A. T. Wall Company to further federal enforcement action, including the assessment of penalties.

If you have any questions concerning this Notice of Noncompliance or regarding Section 112(r) of the CAA, please contact Jim Gaffey at (617) 918-1753.

Sincerely,

Susan Studlien

Susan Studlien, Director
 Office of Environmental Stewardship

cc: Jim Gaffey, EPA Region I